
MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT

Preliminary Determination/Decision - Statement of Basis
for
Renewal of

FOP Number: 3100067

For:

**Southern California
Gas Company**

Facility:

Kelso Compressor Station

Facility Address:

**8 miles South of Kelso on
Kelbaker Road, Kelso, CA 92351**

Document Date: **07-09-20**

Submittal date to EPA/CARB for review: **07-09-20**

EPA/CARB 45-Day Commenting Period ends: **08-24-20**

Public Notice Posted, on or before: **07-15-20**

30-Day Public Commenting Period ends at COB: **08-17-20**

Permit Issue date: On or about: **08-24-20**

Permitting Engineer:
Samuel Oktay, PE

14306 PARK AVENUE, VICTORVILLE, CALIFORNIA 92392
PHONE: (760) 245-1661 • FAX: (760) 245-2022 • EMAIL: PERMITTING@MDAQMD.CA.GOV

A. FACILITY IDENTIFYING INFORMATION:

Owner/Company Name: Southern California Gas Company

Facility Name: Kelso Compressor Station

Facility Location: Kelso; 8 miles South of Kelso
on Kelbaker Road, Kelso, CA 92351

Mailing Address: P.O. Box 2300
Chatsworth CA 91313

Federal Operating Permit Number: 3100067

MDAQMD Company Number: 31

MDAQMD Facility Number: 1626

Responsible Official: Mr. Carlos Gaeta
Field Operations Manager
760-243-6574

Facility Contact: Alison Wong
Senior Environmental Specialist
213-604-4534
AWong2@socalgas.com

Facility "Off Site" Contact(s): Chanice Allen
Environmental Team Lead
213-276-5047
CAllen2@socalgas.com

Nature of Business: Natural Gas Compression and Transmission

SIC/NAICS Code: 4922/486210 – Pipeline Transportation of Natural Gas

Facility Coordinates: UTM11 (km): UTM (Km) 623E / 3863N
Decimal Coordinates: 34.89798, -115.65197

B. BACKGROUND:

The Federal Clean Air Act Amendments of 1990 established a nation-wide permit to operate program commonly known as "Title V". The Mojave Desert Air Quality Management District (MDAQMD or District) adopted Regulation XII [Rules 1200-1210] and Rule 221 - *Federal Operating Permit Requirement*; [Version in SIP = Current, 40CFR 52.220(c)(216)(i)(A)(2) - 02/05/96 61 FR 4217], to implement both the Federal Operating Permit and Acid Rain Permit programs locally and have received Final Program Approval from EPA on March 6, 1996.

This facility (Southern California Gas Company, Kelso Compressor Station) is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and MDAQMD Regulation XII, *Federal Operating Permits*. SCG - Kelso Compressor Station is defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definition*, as this facility has a Potential to Emit (PTE) greater than the Major Facility thresholds for Nitrogen Oxides.

Pursuant to Regulation XII, *Federal Operating Permits*, the District has reviewed the terms and conditions of this Federal Operating Permit and determined that they are still valid and correct. This review included an analysis of federal, state, and local applicability determinations for all sources, including those that have been modified or permitted since the issuance of the initial Federal Operating Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. This *Statement of Legal and Factual Basis*, pursuant to Rule 1203(B)(1)(a)(i), is intended to assess the adequacy of the existing Title V Permit and explain the District's basis in composing the proposed Renewal.

In the MDAQMD, state and District requirements are also applicable requirements and are included in the Federal Operating Permit. These requirements can be federally enforceable or non-federally enforceable. State and District only applicable requirements are designated as such.

The purpose of this action is to renew the Southern California Gas Company, Kelso Compressor Station's, Federal Operating Permit, 3100067.

C. DESCRIPTION OF FACILITY:

Southern California Gas Company (SCG), Kelso Compressor Station, located at 35690 Kelbaker Road, Kelso, CA 92351. SCG, Kelso Compressor Station - is a natural gas compression and transmission pipeline facility located in Kelso, California. Turbine and IC Engine Equipment description as follows:

1. MDAQMD Permit # B000296: TURBINE, CENTRIFUGAL NATURAL GAS COMPRESSOR consisting of: A GE Model Frame 3 turbine, Serial 179556, rated with a maximum heat input of 115 MMBTU/hr, driving a single stage natural gas compressor. Includes one Vapor Control System (VCS), which is comprised of pipes, fittings, and components.

Centrifugal compressor means equipment that increases the pressure of natural gas by centrifugal action through an impeller. Screw, sliding vane, and liquid ring compressors are not centrifugal compressors for the purpose of the Oil and Gas Regulation. [17 CCR 95667 - Definitions]

Stack height is 39.0 feet and stack diameter is 10.5 feet.

Stack gas temperature is 550 deg F at 83553 cfm, and at a velocity of 965 fpm. Equipment

Elevation is 2825 feet above sea level.

2. MDAQMD Permit # B000297: SPARK-IGNITED (SI) NATURAL GAS IC ENGINE, GENERATOR UNIT No. 1 consisting of: Year of Manufacture; 1970; 4SRB; Engine is Subject to RICE NESHAP 40 CFR Part 63 Subpart ZZZZ and is Located at a HAP Area Source. Equipped with the following Control Equipment:

1) RELi E3 Air/Fuel Ratio control. This control system manipulates the fuel delivery to maintain optimum catalytic converter efficiency.

2) Unit control panel. Control panel allows ready viewing of RELi E3 data, including pre and post catalyst temperatures, catalyst differential pressure and allows for setpoint adjustments as required to maintain emission compliance.

3) Catalyst and housing. A non-selective catalytic reduction catalyst (NSCR) is installed to meet emissions requirements.

Stack height is 30.0 feet and stack diameter is 0.67 feet. Stack gas temperature is 500 deg F at 1556 cfm, and at a velocity of 4456 fpm.

Equipment Elevation is 2835 feet above sea level.

One Waukesha, NG fired internal combustion engine Model No. Model L 5180 -GU and Serial No. 139705, Three-Way Catalyst (also NSCR), Four-Stroke Rich Burn, Air-To-Fuel Ratio Controller, producing 465 bhp with 0 cylinders at 900 rpm while consuming a maximum of 3.48 MMBtu/hr. This equipment powers a Unknown Generator Model No. Unknown and Serial No. Unknown, rated at Unknown.

3. STATE ONLY MDAQMD Permit # B013429: NATURAL GAS-POWERED PNEUMATIC DEVICES consisting of: Pneumatic Device means an automation device that uses natural gas, compressed air, or electricity to control a process.

Continuous Low Bleed Pneumatic Devices means the continuous venting of natural gas from a gas-powered pneumatic device to the atmosphere. Continuous bleed pneumatic devices must vent continuously in order to operate.

Intermittent Bleed Pneumatic Devices means the intermittent venting of natural gas from a gas-powered pneumatic device to the atmosphere. Intermittent bleed pneumatic devices may vent all or a portion of their supply gas when control action is necessary but do not vent continuously.

4. MDAQMD PERMIT NUMBER E009232: DIESEL IC ENGINE, FIRE PUMP consisting of: Year of Manufacture: 1970; Tier 0, Engine is subject to RICE NESHAP 40 CFR 63 Subpart ZZZZ for engines located at a HAP Area Source and the Diesel ATCM 93115.

Stack height is 30 feet, and stack diameter is 0.67 feet. Stack gas exhausts at 1556 cfm at a temperature of 500 degrees F and at a velocity of 4456 fpm.

Equipment Elevation is 2825 feet above sea level.

One Detroit, Diesel fired internal combustion engine Model No. 3061-A and Serial No. 3A-75837, producing 85 bhp with 3 cylinders at 1750 rpm while consuming a maximum of 5 gal/hr. This equipment powers a Fairbanks Morris Pump Model No. 5824 and Serial No. K2F1055560, rated at 500 gpm

D. MODIFICATIONS TO CURRENT FEDERAL OPERATING PERMIT:

GENERAL UPDATES

- General formatting to improve the consistency of the Title V permits program.
- Update rule citations throughout the permit. Each rule citation was reformatted for program consistency which includes relocating the SIP citations to Part VII. The table sufficiently identifies each rule, the SIP status of the rule and the federal enforceability of each rule.

PART I: INTRODUCTORY INFORMATION

This section of the Federal Operating Permit contains general information about Southern California Gas Company (SCG), Kelso Compressor Station facility, including facility identifying information (section A), a description of the facility (section B), and a description of the facility's equipment (section C).

Changes made to this section of the FOP, include:

- Change in Responsible Official from Claus Langer to Carlos Gaeta
- Changes made to equipment description for District Permit B000296
- Changes made to equipment description for District Permit B000297
- Changes made to equipment description for District Permit E009232
- STATE ONLY, New District Permit B013429; regarding Natural Gas Pneumatic Devices and Pumps; permit added pursuant to California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10 Climate Change, Article 4, Subarticle 13: Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities.

PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (Section A), facility-wide monitoring, recordkeeping, and reporting requirements (Section B), and facility-wide compliance conditions (Section C).

Changes made to this section of the FOP:

- Part II, Section A. Updated to include rule revisions which occurred since the time of the last renewal.
- Part II, Section A, revised to incorporate changes made to District Rule 442, Usage of Solvents.
- Part II, Section A, revised to incorporate changes made to District Rule 1104, Organic Solvent Degreasing Operations.
- Part II, Section A, revised to incorporate formatting changes referencing District Rule 1113, Architectural Coatings.
- Part II, Section A, revised to incorporate changes made to District Rule 1114, Wood Products Coating Operations.
- Part II, Section A, revised to incorporate changes made to District Rule 1115, Metal Parts & Products Coating Operations.

Changes made to Part II, Section B: None

Changes made to Part II, Section C: None

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring and recordkeeping, reporting and testing, and compliance plans.

- Changes made to Part III, Section A, District Permit B000296; equipment description updated to include stack dimensions and operating parameters and to include Vapor Control System (VCS) as required by State only, Oil and Gas Regulation; conditions have been revised for consistency with other Title V Permits; added conditions 7 through 19, State Only conditions relating to the States Oil and Gas Regulation; added condition 20, the Districts comprehensive emission inventory submittal requests.
- Changes made to Part III, Section B, District Permit B000297; equipment description updated to include stack dimensions and operating parameters. Permit conditions have been revised for consistency with similar permits.
- Changes made to Part III, Section C, District Permit E009232; equipment description updated to include stack dimensions and operating parameters. Permit conditions have been revised for consistency with similar permits.

- Changes made to Part III, Added Section D, State Only, District Permit B013429, NATURAL GAS-POWERED PNEUMATIC DEVICES AND PUMPS and associated permit conditions.

PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS

This section of the Federal Operating Permit contains standard federal operating permit conditions.

Changes made to this section of the FOP: None

PART V: OPERATIONAL FLEXIBILITY

Changes made to this section of the FOP:

Section B, Off Permit Changes has been updated for consistency with similar Title V Permits and now reads as follows:

PART VI: CONVENTIONS, ABBREVIATIONS, DEFINITIONS, MDAQMD APPLICABLE SIP

This section of the Federal Operating Permit contains information on conventions, abbreviations and definitions.

Changes made to this section of the FOP:

Added VCS, Vapor Control System, to the list of Abbreviations.

PART VII: DISTRICT SIP HISTORY AND CITATIONS

This section of the Federal Operating Permit contains a SIP table of all applicable District Rules and Historical Summary.

Changes have been made to this section of the FOP:

- SIP table updated to include rule revisions, which have occurred since the time of the last renewal.

E. RULE APPLICABILITY:

District Rules

Rule 201/203 – *Permits to Construct/Permit to Operate*. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. SCG-Kelso is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintain District permits for all residing equipment per Part II, section A of their FOP.

Rule 204 – *Permit Conditions*. To assure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. SCG-Kelso complies with all applicable regulations per Part II of their FOP.

Rule 206 – *Posting of Permit to Operate*. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. SCG-Kelso complies with this regulation per Part II of their FOP.

Rule 207 – *Altering or Falsifying of Permit*. A person shall not willfully deface, alter, forge, or falsify any issued permit. SCG-Kelso complies with this regulation per Part II of their FOP.

Rule 209 – *Transfer and Voiding of Permits*. SCG-Kelso shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. SCG-Kelso complies with this regulation per Part II their FOP.

Rule 217 – *Provisions for Sampling and Testing Facilities*. This rule stipulates that the APCO may require the applicant to provide and maintain requirements for sampling and testing. In the event that facilities, be equipped to accommodate testing the APCO shall notify the Owner/Operator in writing of the required size, number and location of sampling ports; the size and location of the sampling platform; the access to the sampling platform, and the utilities for operating the sampling and testing equipment. SCG-Kelso is in compliance with this rule per Part II of their FOP.

Rule 219 – *Equipment not Requiring a Permit*. This rule exempts certain equipment from District Permit. SCG-Kelso is in compliance with this rule per Part II.

Rule 221 – *Federal Operating Permit Requirement*. SCG-Kelso is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301/312 – *Permit Fees/Fees for Federal Operating Permits*. SCG-Kelso annual permit fees are due by the applicable amounts.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity. SCG-Kelso is in compliance with this rule per Part II.

Rule 403 – *Fugitive Dust*. This rule prohibits fugitive dust beyond the property line of any emission source. SCG-Kelso is in compliance with this rule per Part II.

Rule 404 – *Particulate Matter Concentration*. SCG-Kelso shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a).

- (a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.

- (b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.
- (c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.
SCG-Kelso is in compliance with this rule per Part II.

Rule 405 – *Solid Particulate Matter, Weight*. SCG-Kelso shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a):

- (a) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.
- (b) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

SCG-Kelso is in compliance with this rule per Part II.

Rule 406 – *Specific Contaminants*. This rule limits single source of emissions of sulfur compounds. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 407 – *Liquid and Gaseous Air Contaminants*. This rule limits CO emissions from facilities. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed renewal as described is not expected to violate Rule 408. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 409 – *Combustion Contaminants*. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO₂) at standard conditions averaged over a minimum of 25 consecutive minutes. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 430 – *Breakdown Provisions*. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 442 – *Usage of Solvents*. This rule reduces VOC emissions from VOC containing materials or equipment that is not subject to any other rule in Regulation XI. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 60. Currently there are no NSPSs applicable to SCG-Kelso.

Rule 1104 – *Organic Solvent Degreasing Operations*. This recently revised rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1113 – *Architectural Coatings*. This rule limits the quantity of VOC in Architectural Coatings. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1114– *Wood Products Coatings*. This recently revised rule limits the quantity of VOC in Wood Coatings. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1115 – *Metal Parts and Products Coatings*. This recently revised rule limits the emission of VOC from coatings associated with Metal Parts and Products. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1159 – *Stationary Gas Turbines*. The purpose of this rule is to limit the emission of oxides of nitrogen from commercial, industrial and institutional Stationary Gas Turbines and applies to any new or existing non-utility, commercial, industrial or institutional Stationary Gas Turbine of 0.3 megawatt (MW) and larger unless the equipment is exempt from this rule pursuant to Section (D) of this rule. SCG-Kelso meets the requirements of this rule by complying with operating conditions listed in Part III, of their FOP.

Regulation X – *Emission Standards for Additional Specific Air Contaminants*. Pursuant to Regulation X, SCG-Kelso is required to comply with all applicable ATCMs, MACTs and NESHAPS. There are currently no ATCMs that apply to the SCG-Kelso. The specific MACTs/NESHAPS applicable to SCG-Kelso are listed under the Federal Requirements below.

Regulation XII – *Federal Operating Permits*. This regulation contains requirements for sources which must have a FOP. SCG-Kelso currently has a FOP and is expected to comply with all applicable rules and regulations.

Rule 1201 – *Federal Operating Permit Definitions*. SCG-Kelso is defined as a federal Major Facility pursuant to this rule.

Rule 1203 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. SCG-Kelso meets this requirement by complying with operating condition listed in Part II, of their FOP.

Rule 1205 – *Modifications of Federal Operating Permits*. This action to SCG-Kelso's FOP does not constitute a modification; therefore, this rule is not subject to this action.

Rule 1206 – *Reopening, Reissuance and Termination of Federal Operating Permits*. This action to SCG-Kelso’s FOP does not constitute a Reopening, Reissuance or Termination of Federal Operating Permits; therefore, this rule is not subject to this action.

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. SCG-Kelso has and/or will properly notice(d) their renewal pursuant to this rule.

Rule 1208 – *Certification*. SCG-Kelso included a Certification of Responsible Official as required with the submitted application for the Renewal.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. SCG-Kelso is a Major GHG Facility pursuant to Rule 1211 and has is in compliance with the requirements pertaining to this regulation.

Regulation XIII – *New Source Review*. This regulation sets forth requirements for the preconstruction review of all new or modified facilities. SCG-Kelso is not a new facility nor is it currently a modified facility; therefore, this regulation does not apply.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. This rule controls the emission of toxic air contaminants from existing source. This permit action does not trigger the applicability of Rule 1520.

Regulation XVII – *Prevention of Significant Deterioration*

Please take notice that this regulation is not currently used within the MDAQMD because the USEPA has not delegated authority for the PSD Program to the MDAQMD at this time. That said, this action to renew the SCG-Kelso Title V FOP, does not trigger a PSD analysis as there are no emission changes associated with this activity.

Federal Regulations

40 CFR 63, Subpart ZZZZ–National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines. SCG-Kelso complies with this regulation per Part II of their FOP.

40 CFR 64, *Compliance Assurance Monitoring*. The Compliance Assurance Monitoring (CAM) rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a Major Facility that is required to obtain Title V, Part 70 or 71 permit and it meets all of the following criteria. “PSEU” means an emissions unit considered separately with respect to each regulated air pollutant.

The PSEU must:

- a. Be subject to an emission limitation or standard [40 CFR 64; AND,
- b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
- c. Have the **potential pre-control** emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

The only equipment at this facility equipped with an air pollution control device is the equipment operating with District Permit B000297. Upon review of this equipment, it is determined that CAM is Not Applicable. Calculations indicate that the Uncontrolled Potential to Emit from this equipment is 57.3 TPY for NO_x and 0.77 TPY for VOC. These values are below the 100 TPY Major Source threshold pursuant to District Rule 1201 for a facility located outside the Federal Ozone Nonattainment Area (FONA). Please see Appendix B for a complete CAM Analysis.

F. CONCLUSIONS AND RECOMMENDATION:

The District has reviewed the application for the renewal of the Federal Operating Permit. The District has determined that the renewal permit is in compliance with all applicable District, state, and federal rules and regulations as proposed when operated in the terms of the permit conditions given herein. The proposed permit and corresponding statement of legal and factual basis has been, or will be, publicly noticed pursuant to District Rule 1207. To view the public notice please refer to Appendix C of this document.

G. PUBLIC COMMENT AND NOTIFICATIONS:

1. Public Comment

This preliminary determination will be publicly noticed on or before 07-15-20
The 30-Day Public Commenting Period that will end at COB on 08-17-20

Noticing Methods include the following, per District Rule 1207 (A)(1)(a) and District Rule 1302(D)(2) and (3):

- Published in newspapers of general circulation - Riverside Press Enterprise (Riverside County) and the Daily Press (San Bernardino County) on or before 07-15-20.
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in this Appendix) on or before 07-09-20.
- Posted on the MDAQMD Website at the following link:
<http://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry>

2. Notifications

The preliminary determination was submitted via e-mail to EPA and CARB pursuant to District Rule 1207 for a forty-five (45) day review period on or before 07-09-20. The final modified FOP shall be issued on or about 08-24-20.

All correspondence as required by District Rules 1302 and 1207 were forwarded electronically to the following recipients:

Director, Office of Air Division
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Via EPA's Portal: <https://cdx.epa.gov/>

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
Via e-mail at: Permits@arb.ca.gov

Field Operations Manager C/O Alison Wong via e-mail
Southern California Gas Company
P.O. Box 2300, Chatsworth CA 91313

APPENDIX A Application Cover



RECEIVED
MDAQMD
18 DEC 17 PM 1:05

Alison Wong
Technical Advisor-Environmental
Southern California Gas Co.
Tel: (213) 604-4534

Southern California
Gas Company
PO Box 2300 SC9314
Chatsworth, CA
91313 - 2300

31/1626
Section/Category: Title V
Type: TS APP
Date: 12/16/19

December 11, 2018

Mr. Sam Oktay
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392

Subject: Title V Renewal Package for Kelso Compressor Station; Permit Number 3100067

Dear Mr. Oktay,

Title V Permit No. 3100067 was issued to the Southern California Gas Company's Kelso Compressor Station facility with an expiration date of October 29, 2019. Mojave Desert Air Quality Management District (MDAQMD) Rule 1202 requires Title V permit holder to apply for renewal of the Title V permit no more than 18 months prior to expiration and no less than 6 months prior to the expiration date of the permit. The enclosed Title V renewal package has been prepared and submitted timely for the Kelso Compressor Station facility to comply with Rule 1202.

This renewal application package includes the following -

- Title V permit renewal application forms are included in Appendix A.
- Appendix B includes review of MDAQMD rules that changed since the last renewal. Updated MDAQMD Rules include 1104, 1114, and 1115.
- A draft marked-up permit with requested administrative revisions to equipment descriptions and permit conditions is included in Appendix C. In addition to the rule updates mentioned in Appendix B, the following revisions are requested.
 - Page I-4. Request to update contact information.
 - Page I-5. Request to update equipment descriptions.
 - Page II-19. Request to add new condition 32 regarding out-of-service equipment.
 - Page III-24. Section A. Request to add vapor collection system to equipment description of turbine compressor.
 - Page III-24. Condition III.A.2. Request to add language related to missing records of fuel usage citing procedures per 40 CFR Part 98.

SoCal Gas is submitting a complete Title V Renewal application per Rule 1202 Section D as discussed below.

- (a) Identifying information as required on the official application form designated by the APCO.

Completed application forms designated by the APCO are included in Appendix A.

- (b) A description of the Facility's processes and/or products by Standard Industrial Classification Code. A separate description is required for each alternate operating scenario proposed by the applicant.

All processes and equipment at the facility are under SIC Code 4922. A description of facility processes and equipment with requested administrative revisions is included in Appendix C. No alternate operating scenarios are being proposed in this renewal application.

- (c) Information sufficient to evaluate the emissions of the Facility, including but not limited to:

- (i) The amount and type of emissions which render the Facility a Major Facility as defined in District Rule 1201 and the amount and type of emissions for any other Regulated Air Pollutant.

Appendix A includes the potential emissions for each equipment located at the facility.

- (ii) The amount and type of emissions, in tons per year and in such terms as are necessary to establish compliance with an applicable standard reference test method of any Regulated Air Pollutant.

Appendix A includes the potential emissions for each equipment located at the facility.

- (iii) Identification and description of all Permit Units and other points of emission within the Facility.

A description of facility processes and equipment with requested administrative revisions is included in Appendix C.

- (iv) Identification and description of all air pollution control equipment and monitoring devices within the Facility.

A description of all air pollution control equipment and monitoring devices and requested administrative revisions is included in Appendix C.

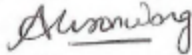
- (v) Information regarding fuels, fuel use, raw materials, process weight, production rates and operating schedules to the extent such information is used to determine or regulate emissions.

(g) A list of all activities claimed to be insignificant pursuant to District Rule 219.

A list of all insignificant activities at this facility is included in Appendix A.

If you have any questions or need further information, please contact me at 213-604-4534 or by email at awong2@semptrautilities.com.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alison Wong".

Alison Wong
Technical Advisor Environmental

Potential Emissions of criteria pollutants, greenhouse gases, and hazardous air pollutants from each equipment at the facility are included in Appendix A. The potential emissions were calculated based on maximum fuel usage allowed by the permit.

- (vi) Any limitations on Facility operations, or common practices within the facility which affect the emissions of Air Pollutants.

Permit limits and requested administrative revisions are included in Appendix C.

- (vii) Any other information specifically required by an Applicable Requirement.

No other information is required.

- (viii) Any calculations upon which the above information is based.

Appendix A includes the potential emissions for each equipment located at the facility.

- (ix) Fugitive emissions shall be included in the application in the same manner as any other emissions.

There are no permitted fugitive emission sources located at this facility.

- (d) Information regarding Applicable Requirements including but not limited to:

- (i) Citation and description of all Applicable Requirements including a description or reference to test methods used to determine compliance.

Applicable requirements and requested administrative revisions are included in Appendix B.

- (ii) Any other specific information necessary to implement and enforce other Applicable Requirements or to determine if a requirement is an Applicable Requirement.

No other information is required.

- (iii) An explanation of any proposed exemptions from Applicable Requirements.

Rule 1160 does not apply to the facility since the facility is not located within the federal ozone non-attainment area.

- (e) Any additional information determined to be necessary to define alternative operating scenarios or to define permit terms and conditions necessary to implement operational flexibility under District Rule 1203(E).

Not applicable.

- (f) A Compliance Plan and a Certification of Compliance.

This facility is in compliance with requirements. A compliance plan is not required. The Certification of Compliance is included in Appendix A.

APPENDIX B
Application Forms

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – GENERAL FACILITY INFORMATION


RECEIVED
MDAQMD
18 DEC 17 PM 1:0

1. FACILITY ID: <u>01626</u>		FACILITY SIC CODE: <u>4922-Natural Gas Pipeline</u>	
TITLE V PERMIT NUMBER: <u>3100067</u>		PERMIT EXPIRATION DATE: <u>10/29/2019</u>	
2. COMPANY NAME: <u>Southern California Gas Company</u>			
3. COMPANY MAILING ADDRESS:			
STREET/P.O. BOX: <u>P.O. Box 2300 SC9314</u>			
CITY: <u>Chatsworth</u>	STATE: <u>CA</u>	9-DIGIT ZIP CODE: <u>91313</u>	
4. FACILITY NAME: <u>Kelso Compressor Station</u>			
5. FACILITY MAILING ADDRESS: PHYSICAL ADDRESS			
STREET/P.O. BOX: <u>SCG - Kelso; 8 miles South of Kelso on Kelbaker Road (#35690)</u>			
CITY: <u>Kelso</u>	STATE: <u>CA</u>	9-DIGIT ZIP CODE: <u>92351</u>	
6. RESPONSIBLE OFFICIAL (AS DEFINED IN 40 CFR 70.2 AND MDAQMD RULE 1201)			
NAME: <u>Mr. Carlos Gaeta</u>	TITLE: <u>Field Operations Manager</u>	PHONE NUMBER: <u>760-243-6574</u>	
7. TITLE V PERMIT CONTACT PERSON			
NAME: <u>Justin Griffis</u>	TITLE: <u>Station Maintenance Supervisor</u>	PHONE NUMBER: <u>760-243-6561</u>	
8. TYPE OF ORGANIZATION:			
<input type="checkbox"/> CORPORATION <input type="checkbox"/> SOLE OWNERSHIP <input type="checkbox"/> GOVERNMENT <input type="checkbox"/> PARTNERSHIP <input checked="" type="checkbox"/> UTILITY			
9. CAM (COMPLIANCE ASSURANCE MONITORING) PLANS			
Are you required to submit a CAM plan for any emissions unit at this facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If yes, submit a CAM plan for each emissions unit as an attachment to the application. See attached CAM plan instructions for more detail.			

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-A

<p>10. ALTERNATE OPERATING SCENARIOS</p> <p>Does this application request alternative operating scenarios pursuant to Rule 1203(E)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, submit an Alternate Operating Scenarios form, as applicable.</p>
<p>11. RISK MANAGEMENT PLAN</p> <p>Has this facility been required to prepare a federal Risk Management Plan pursuant to Section 112(r) of the federal Clean Air Act and 40 CFR Part 68? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, has the federal Risk Management Plan been submitted to the implementing agency? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If a federal Risk Management Plan is required but has not been submitted to the implementing agency, provide a detailed explanation as an attachment to the application.</p>
<p>12. STRATOSPHERIC OZONE</p> <p>Does the facility conduct any activities that are regulated by the federal protection of stratospheric ozone requirements in 40 CFR Part 82? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>13. ACID RAIN</p> <p>Is this facility subject to the acid rain requirement in 40 CFR Part 72 through 40 CFR Part 78? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>14. MAJOR SOURCE STATUS</p> <p>Is this facility a major source of greenhouse gases, as defined in MDAQMD Rule 1211? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Is this facility a major source of any of the following pollutants:</p> <p> <input type="checkbox"/> VOCs <input type="checkbox"/> Particulate Matter <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Nitrogen Oxides <input type="checkbox"/> Sulfur Dioxides <input type="checkbox"/> Lead <input type="checkbox"/> HAP </p>
<p>15. PERMIT SHIELDS</p> <p>Does the current Title V permit for this facility include any permit shields? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If yes, is the basis for each permit shield still correct? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If the current Title V permit contains any permit shield for which the basis is no longer correct, provide a detailed explanation as an attachment to the application. If you are requesting an additional permit shield, complete the attached Permit Shield Request form.</p>
<p>16. CERTIFICATION BY RESPONSIBLE OFFICIAL</p> <p>Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete. I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:</p> <p>Signature: <u></u> Date: <u>12-11-18</u></p>

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-A

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – APPLICATION CERTIFICATION

I. FACILITY INFORMATION

1. FACILITY NAME: Kelso Compressor Station
2. FACILITY ID: 01626
3. TITLE V PERMIT #: 3100067

II. TITLE V PERMIT CERTIFICATION (Read each statement carefully and check one):

- ☐ The current Title V permit has been reviewed and it has been determined that equipment descriptions are correct, and all requirements are still applicable.
- ☒ The current Title V permit has been reviewed and errors have been found in equipment descriptions and/or permit requirements. A copy of the Title V permit is attached with redline changes. Permit application and/or modification forms are enclosed, as applicable.

III. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s), except for those requirements listed in the "Title V Non-Compliant Operations Report".
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis, except for those requirements listed in the "Title V Non-Compliant Operations Report".
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete. I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true.



Signature of Responsible Official

12-11-18

Date

Carlos Gaeta

Name of Responsible Official (please print)

Field Operations Manager

Title of Responsible Official (please print)

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – LIST OF EXEMPT EQUIPMENT

I. FACILITY INFORMATION

1. FACILITY NAME: Kelso Compressor Station
2. FACILITY ID: 01626
3. TITLE V PERMIT #: 3100067

II. SUMMARY OF EQUIPMENT EXEMPT FROM PERMIT REQUIREMENTS (INCLUDING PORTABLE)

4. EXEMPT EQUIPMENT DESCRIPTION	5. VENTING TO CONTROL (PERMIT #)	6. CONTROL DEVICE DESCRIPTION	7. BASIS FOR EXEMPTION (e.g. Rule 219(D)(2)(b))
Glycol tank			Rule 219(E)(14)(c)(ii)
Turbine oil tank			R. 219 (E)(14)(h)
Engine oil tank			R. 219 (E)(14)(h)
Diesel tank			Rule 219(E)(14)(c)(iii)
Electric Welding Machine			R. 219 (E)(5)(e)
Torch cutter			R. 219 (E)(5)(e)

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-D

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Kelso Compressor Station
2. FACILITY ID: 01626
3. TITLE V PERMIT #: 3100067

II. CAM STATUS SUMMARY FOR EMISSION UNITS

4. Based on the criteria in the instructions (check one and attach additional pages as necessary):						
a. <input type="checkbox"/> There are no emission units with control devices at this Title V facility.						
b. <input checked="" type="checkbox"/> There are emission units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM plan is attached for each affected emissions unit.						
5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON FOR EXEMPTION)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
B00297	ICE Generator with NSCR	NO _x	57.3	No		No
B00297	ICE Generator with NSCR	VOC	0.77	No		No

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-F

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL EMISSIONS REPORT, CRITERIA POLLUTANTS & HAPs

I. FACILITY INFORMATION

1. FACILITY NAME:	Kelso Compressor Station
2. FACILITY ID:	01626
3. TITLE V PERMIT #:	3100067

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS							
		NOx (TPY)	VOC (TPY)	PM10 (TPY)	PM2.5 (TPY)	SOx (TPY)	CO (TPY)	Other: HAP (TPY)	Other: (TPY)
B000297	I.C. ENGINE - ELECTRICAL GENERATOR	50.30	0.77	0.25	0.25	0.02	9.15	0.55	
B000296	TURBINE - COMPRESSOR	423.63	1.06	3.32	3.32	1.71	41.3	1.03	
B009232	EMERGENCY FIRE PUMP	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-E

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL GREENHOUSE GAS EMISSIONS REPORT

I. FACILITY INFORMATION

1. FACILITY NAME: Kelso Compressor Station
2. FACILITY ID: 01626
3. TITLE V PERMIT #: 3100067

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS							
		CO ₂ (TPY)	N ₂ O (TPY)	CH ₄ (TPY)	HFCs (TPY)	PFCs (TPY)	SF ₆ (TPY)	Other: (TPY)	CO ₂ (e) (TPY)
B000297	I.C. ENGINE - ELECTRICAL GENERATOR	3,035	0.01	0.06					3,054
B000296	TURBINE -COMPRESSOR	58,954	0.11	1.11					59,300
B009232	EMERGENCY FIRE PUMP	2.43	< 0.01	< 0.01					2.46

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-E

APPENDIX B

Rule	Rule #	Rule Title	Last Amendment Date	Amended after 10/25/14?	Applicable to Facility?	Update to permit conditions?
Rule 102	102	Definition of Terms	4/23/2018	Yes	Yes	No
Rule 219	219	Equipment Not Requiring a Permit	9/25/2018	Yes	Yes	No
Rule 300	300	Delinquency Penalty	9/25/2018	Yes	Yes	No
Rule 301	301	Permit Fees	9/25/2017	Yes	Yes	No
Rule 301	301	Permit Fees (Effective 01/01/19)	9/25/2018	Yes	Yes	No
Rule 302	302	Other Fees	9/25/2018	Yes	Yes	No
Rule 303	303	Hearing Board Fees	9/25/2018	Yes	Yes	No
Rule 461	461	Gasoline Transfer and Dispensing	1/22/2018	Yes	No	No
Rule 462	462	Organic Liquid Loading	1/22/2018	Yes	No	No
Rule 463	463	Storage of Organic Liquids	1/22/2018	Yes	No	No
Rule 1104	1104	Organic Solvent Degreasing Operations	04/23/18	Yes	Yes	Yes, See Appendix B Draft Permit for changes
Rule 1106	1106	Marine Coating Operations	10/24/2019	Yes	No	No
Rule 1114	1114	Wood Products Coating Operations	1/22/2018	Yes	Yes	Yes, See Appendix B Draft Permit for changes
Rule 1115	1115	Metal Parts & Products Coating Operations	1/22/2018	Yes	Yes	Yes, See Appendix B Draft Permit for changes
Rule 1118	1118	Aerospace Assembly, Rework and Component Manufacturing Operations	10/29/2015	Yes	No	No
Rule 1157	1157	Boilers and Process Heaters	1/22/2018	Yes	No	No
Rule 1158	1158	Electric Power Generating Facilities	06/29/17	Yes	No	No
Rule 1160	1160	Internal Combustion Engines	1/22/2018	Yes	Yes	No. Exempt as facility is outside the Federal Ozone Non-attainment Area (Rule 1100(D)(1)(g))
Rule 1161	1161	Portland Cement Kilns	1/22/2018	Yes	No	No
Rule 1162	1162	Polyester Resin Operations	04/23/18	Yes	No	No
Rule 1300	1300	General	8/22/2016	Yes	Yes	No
Rule 1302	1302	Procedure	8/22/2016	Yes	Yes	No
Rule 1320	1320	New Source Review For Toxic Air Contaminants	8/22/2016	Yes	Yes	No
Rule 1600	1600	Prevention Of Significant Deterioration (PSD)	8/22/2016	Yes	Yes	No
40 CFR 70.7		Permit issuance, renewal, reopenings, and revisions	10/18/2016	Yes	Yes	No
40 CFR 82 Subpart F		Recycling and Emission Reductions	12/27/2017	Yes	Yes	No

APPENDIX C - Public Notice

NOTICE OF TITLE V PERMIT RENEWAL

NOTICE IS HEREBY GIVEN THAT *Southern California Gas Company – Kelso Compressor Station*, located 8 miles South of Kelso on Kelbaker Road, Kelso, CA 92351, has applied for the renewal of their Federal Operating Permit (FOP) pursuant to the provisions of MDAQMD Regulation XII. The Applicant is a company engaged in the compression and distribution of pipeline quality natural gas for use by its customers throughout Southern California. The facility is required to maintain a Title V permit because the potential emissions exceed the major source threshold for Nitrous Oxides.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed renewal of *Southern California Gas Company – Kelso Compressor Station's*, Federal Operating Permit. If you submit written comments, you may also request a public hearing on the proposed issuance of the Federal Operating Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on August 17, 2020, to the MDAQMD, Attention: Samuel J Oktay, PE at the address listed below.

PETITION FOR REVIEW: Federal Operating Permits are also subject to review and approval by the United States Environmental Protection Agency (USEPA). If the USEPA finds no objection to the proposed permit renewal, the final permit will be issued. In the event of public objection to the issuance of a specific permit, a Title V petition may be submitted to the USEPA Administrator electronically through the Central Data Exchange at: <https://cdx.epa.gov/>. In order to file a Title V petition, issues must be raised with reasonable specificity during the public comment period, and filed within 60 days of the close of the USEPA review period.

AVAILABILITY OF DOCUMENTS: The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, CA 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: <https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry>. Please contact Samuel J Oktay, PE, Air Quality Engineer, at the address, above, or (760) 245-1661, extension 1610, or at soktay@mdaqmd.ca.gov for additional questions pertaining to this action and/or corresponding documents.

Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661

SHERI HAGGARD
Engineering Supervisor II
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392

Mr. Larry Trowsdale mchsi 951 E Skylark Ave Ridgecrest, CA 93555	Ms. Janet Laurain Adams Broadwell Joseph & Cardozo 601 Gateway Blvd., St. 1000 South San Francisco, CA 94080-7037	Mr. Ramon Campos Environmental Compliance Manager, Blythe 385 N Buck Blvd Blythe, CA 92225
Chief, Planning Division California Air Resources Board P.O. Box 2815 Sacramento, CA 95812	Ms. Desirea Haggard Environmental Manager, CalPortland-Oro 2025 E Financial Way Glendora, CA 91741	City Manager City of Barstow 220 East Mountain View, Suite A Barstow, CA 92311
Mr. Mike Sword Planning Div Mgr, Clark Co Dept of Air Q and 4701 Russell Road, Suite 200 Las Vegas, NV 89118	Mr. Michael Olokode Air Program Manager, N45NCW, NAWs 429 E Bowen Rd, Stop 4014 China Lake, CA 93555-6108	Mr. Kent T. Christensen HS&E Manager, Ducommun Aerostructures 4001 El Mirage Road Adelanto, CA 92301
Environmental Manager Duffield Marine, Inc. 17260 Muskrat Avenue Adelanto, CA 92301	Mr. Randy Lack Chief Marketing Officer, Element Markets, 3555 Timmons Lane, Suite 900 Houston, TX 77027	Ms. Christine Grandstaff Evolution Markets 27801 Golden Ridge Lane San Juan Capistrano, CA 92675
Mr. Jon Boyer High Desert Power Project LLC 19000 Perimeter Rd Victorville, CA 92394	Mr. Glen King Environmental Manager, Luz Solar Partners 43880 Harper Lake Road Harper Lake, CA 92347	Mr. Mike Plessie HQBN B CO, NREA MCAGCC Box 788110 Twentynine Palms, CA 92278-8110
Ms. Carol Kaufman Metropolitan Water District 700 N Alameda Street, 8th Floor, Rm 106 Los Angeles, CA 90012	Mr. David Rib Environmental Manager, Mitsubishi Cement 5808 State Highway 18 Lucerne Valley, CA 92356-9691	Environmental Manager Mobile Pipe Lining & Coating, Inc 12766 Violet Road Adelanto, CA 92301
Mr. John F. Espinoza Principal Advisor, MP Materials HC1 Box 224, 67750 Bailey Road Mountain Pass, CA 92366	Mr. Mark Solheid Senior EHS Analyst, NASA/Goldstone DSCC 93 Goldstone Road Fort Irwin, CA 92310	Mr. Don Shepherd National Park Service, Air Resources Div 12795 W Alameda Pkwy Lakewood, CO 80228
Chief, Bureau of Air Quality NDCNR, Env Prot Div (Air) 901 South Stewart St, Suite 4001 Carson City, NV 89701-5249	Mr. Dan Madden EH&S Manager, Northwest Pipe Co. 12351 Rancho Road Adelanto, CA 92301	Mr. Kou Thao Environmental Scientist, PG&E P.O. Box 7640 San Francisco, CA 94120
Mr. Steve Smith SB County Transportation Authority 1170 W. Third Street, Second Floor San Bernardino, CA 92410	Mr. Anoop Sukumaran Environmental Engineer, Searles Valley P.O. Box 367 Trona, CA 93592-0367	Ms. Karin Fickerson Air Quality Team Lead, SoCalGas 1650 Mountain View Avenue Oxnard, CA 93030
Environmental Contact Specialty Minerals Inc. P.O. Box 558 Lucerne Valley, CA 92356-0558	Director, Air Division (Attn: AIR-3) United States EPA, Region IX 75 Hawthorne Street San Francisco, CA 94105	Ms. Anne McQueen Senior Engineer, Yorke Engineering, LLC 31726 Rancho Viejo Road, Suite 218 San Juan Capistrano, CA 92675

Figure 1: MDAQMD contact list of persons requesting notice of actions (continued from previous page)

Air Program Manager Environmental Division, USMC MCLB Box 110170 Bldg 196 Barstow, CA 92311	Mr. Anthony Fang Metropolitan Water District 700 N Alameda Street, 8th Floor Rm 106 Los Angeles, CA 90012	Ms. Lisa Beckham United States EPA, Region IX 75 Hawthorne Street San Francisco, CA 94105
Air Program Manager, Bureau of Indian 1451 Research Park Drive, Suite 100 Riverside, CA 92507	Andrew Salas Chairman, Gabriel Band of Mission Indians - PO Box 393 Covina, CA 91723	Chief, San Gabriel Band of Mission Indians PO Box 693 San Gabriel, CA 91778
Mr. Steve Cummings Senior Air Quality Tech Specialist, Southern P.O. Box 800 Rosemead, CA 91770	Mr. James Sharp HSE Manager, Elementis Specialties 31763 Mountain View Road Newberry Springs, CA 92365	Ms. Jenna Latt CARB/Office of Ombudsman 9480 Telstar Avenue, Annex 1 El Monte, CA 91731
Mr. Ralph McCullers EH&S Manager, OMYA (California), Inc. 7225 Crystal Creek Rd Lucerne Valley, CA 92356	Mr. Joseph Hower Principal, Air Sciences, Ramboll Environ 350 S Grand Ave, Ste 2800 Los Angeles, CA 90017	Mr. Guy Smith Permit Engineer, Mojave Desert AQMD 14306 Park Ave Victorville, CA 92392
Mr. Josh Dugas Division Chief, San Bernardino County EHS 385 N Arrowhead Ave, Second Floor San Bernardino, CA 92415-0160	Ms. Cinnamon Smith Sr. Specialist - Permitting & Compliance, 1001 Louisiana Street, 891H Houston, TX 77002	Mr. John Vidic Air Program Manager, USAF 412 120 N. Rosamond Blvd, Bldg. 3735 (Ste A) Edwards AFB, CA 93524
Mr. Dan Guillory Environmental Contact, Metropolitan Water P O Box 54153 Los Angeles, CA 90054	Ms. Jessica Gammett Environmental Manager, CalPortland 19409 National Trails Hwy Oro Grande, CA 92368	Mr. Zeyd Tabbara Broker, BGC Environmental Brokerage 1 Seaport Plaza New York, NY 10038
Ms. Alexandra Minitrez Air Compliance Specialist, MP Materials HC1 Box 224, 67750 Bailey Road Mountain Pass, CA 92366	Ms. Dolores Wyant 18710 Corwin Road Apple Valley, CA 92307	Ms. Jaclyn Ferlita Air Quality Consultants 5881 Engineer Drive Huntington Beach, CA 92649
Mr. Tung Le Manager, Energy Section, CARB P.O. Box 2815 Sacramento, CA 95812	Mr. Tom Lucas Drew Carriage 5540 Brooks Street Montclair, CA 91763	Mr. Kou Thao Air Quality, Pacific Gas and Electric (Attn Air P.O. Box 7640 San Francisco, CA 94120
Mr. Gary S Rubenstein Sierra Research 3301 C Street, Suite 400 Sacramento, CA 95816	Ms. Chanice Allen Environmental Team Lead, SoCalGas 8101 Rosemead Blvd, SC722P Pico Rivera, CA 90660	Ms. Alison Wong Technical Advisor, SoCalGas 8101 Rosemead Blvd, SC722P Pico Rivera, CA 90660
Mr. Carlos Gaeta Southern California Gas Company 17071 Gas Line Rd, M/L SC700F Victorville, CA 92394-1007	Mr. Robert Leone Governing Board Member, Town of Yucca 57090 29 Palms Highway Yucca Valley, CA 92284	Mr. Juan Hernandez Molded Fiber Glass WEst 9400 Holly Road Adelanto, CA 92301

Figure 1: MDAQMD contact list of persons requesting notice of actions (continued from previous page)

Mr. Ed Trenn
Molded Fiber Glass Companies West
9400 Holly Road
Adelanto, CA 92301

Figure 1: MDAQMD contact list of persons requesting notice of actions (continued from previous page)